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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,

20 Individual and Representative Plaintiffs,
21 v.
22 META PLATFORMS, INC., a Delaware
corporation;
23 Defendant.

Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED] ORDER RE
SCHEDULING OF DEPOSITION**

1 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher
 2 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,
 3 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher
 4 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Defendant”) (collectively, the
 5 “Parties”) by and through their respective counsel stipulate to the following:

6 WHEREAS, the Court entered an Order extending the discovery deadline until December
 7 13, 2024. ECF No. 211.

8 WHEREAS, pursuant to Magistrate Judge Hixson’s Order regarding deposition discovery
 9 (ECF No. 242), the Parties have scheduled approximately twenty other depositions that will take
 10 place across the United States and in Europe over the next seven weeks (Ghajar Decl. ¶ 3);

11 WHEREAS, following an Order from Magistrate Judge Hixson denying Defendant’s
 12 motion for protective order regarding the deposition of its CEO Mr. Zuckerberg (ECF No. 171),
 13 the Parties conferred to find an acceptable date for Mr. Zuckerberg’s deposition. Defendant offered
 14 October 25, 2024 as a potential date for Mr. Zuckerberg’s deposition, but Plaintiffs were unable to
 15 accept that date. Subsequently, the Parties extensively met and conferred – and to avoid further
 16 motion practice regarding that deposition – they ultimately reached an agreement regarding the
 17 timing and other parameters of the deposition (Ghajar Decl. ¶ 4);

18 WHEREAS, as part of the negotiated agreement, the Parties agreed to take the deposition
 19 of Mr. Zuckerberg on Tuesday, December 17, 2024 – four days after the Court’s December 13,
 20 2024 fact discovery deadline – to accommodate the schedules of Mr. Zuckerberg and the Parties
 21 (*Id.* ¶ 5-6);

22 WHEREAS, that deposition is the only deposition that the Parties have scheduled outside
 23 of the December 13, 2024 fact discovery deadline (*Id.* ¶ 7);

24 WHEREAS, the Parties agree that the timing of this deposition a few days after the fact
 25 discovery deadline will not impact any subsequent dates in the Scheduling Order, including the
 26 deadlines for expert discovery or summary judgment (*Id.* ¶ 8);

27 WHEREAS, there has only been one extension of the fact discovery deadline requested and
 28 entered in this case, which was the Court’s Order setting the December 13, 2024 fact discovery

1 deadline (*Id.* ¶ 9).

2 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through
3 Plaintiffs and Defendant, as represented by their undersigned counsel and subject to the approval
4 of the Court, that the deposition of Mr. Zuckerberg may occur on Tuesday, December 17, 2024,
5 after the close of fact discovery, in accordance with the terms agreed to by the Parties. No other
6 deadlines are modified by this stipulation.

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1 Dated: October 29, 2024

2 By: /s/ DRAFT3
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Respectfully Submitted,

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Plaintiffs and the Proposed Class

PROPOSED ORDER

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.**

DATED: _____

HON. VINCE CHHABRIA
United States District Judge

ECF ATTESTATION

2 Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concurs in the
3 filing of this document.

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5 /s/ *Kathleen R. Hartnett*

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